

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ZENIMAX MEDIA INC. and
ID SOFTWARE LLC,

Plaintiffs,

v.

OCULUS VR, LLC,
PALMER LUCKEY,
and FACEBOOK, INC.

Defendants.

CIVIL CASE NO. 3:14-cv-01849-P

**PLAINTIFFS' APPENDIX TO THEIR MOTION TO COMPEL
RESPONSES TO REQUESTS FOR PRODUCTION AND INTERROGATORIES**

<u>DOCUMENT</u>	<u>EXHIBIT</u>	<u>PAGE(S)</u>
Letter from P. Anthony Sammi to G. Howard, dated September 3, 2014 (enclosing copy of ZeniMax Media Inc. and id Software LLC's First Set of Requests for Production and Inspection to Oculus VR, Inc. and Palmer Luckey, dated July 9, 2014)	1	1-18
ZeniMax Media Inc. and id Software LLC's Second Set of Requests for Production to Defendants, dated September 17, 2014 (redacted)	2	19-27
ZeniMax Media Inc. and id Software LLC's Second Set of Interrogatories to Oculus VR, LLC and Palmer Luckey, dated September 17, 2014 (confidential information of Defendants redacted)	3	28-32
Defendant Facebook's Objections to ZeniMax Media Inc. and id Software LLC's First Set of Requests for Production and Inspection, dated October 3, 2014	4	33-82

<u>DOCUMENT</u>	<u>EXHIBIT</u>	<u>PAGE(S)</u>
Defendants Oculus VR, LLC, Palmer Luckey and Facebook, Inc.'s Objections to ZeniMax Media Inc. and id Software LLC's Second Set of Requests for Production, dated October 17, 2014 (redacted)	5	83-108
Defendants Oculus VR, LLC and Palmer Luckey's Objections to ZeniMax Media Inc. and id Software LLC's Second Set of Interrogatories, dated October 17, 2014 (confidential information of Defendants redacted)	6	109-119
Letter from P. Anthony Sammi to M. Rhodes, dated March 26, 2015	7	120-127
E-mail from M. Caplan to K. Hemr, dated April 9, 2015	8	128-130
E-mail from M. Caplan to P. Philbin and others, dated March 3, 2015 (attached discovery requests omitted)	9	131-132
E-mail from K. Voorhees to Defendants' Counsel, dated April 2, 2015 (attached discovery requests omitted)	10	133-134
E-mail from M. Caplan to P. Philbin and others, dated April 17, 2015 (attached discovery requests omitted)	11	135-136
E-mail from J. McIntosh to P. Philbin and others, dated April 24, 2015 (attached notices omitted)	12	137-138

Dated: April 27, 2015

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Respectfully submitted,

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CERTIFICATE OF SERVICE

On April 27, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Dated: April 27, 2015

s/ Phillip B. Philbin

Phillip B. Philbin